

FILED

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

September 03, 2024
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY: SL
DEPUTY

UNITED STATES OF AMERICA,

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SEALED

v.

Case No: 1:24-mj-559-DH

**AUBREY COTTLE, aka Kirtaner
Defendant.**

MOTION TO SEAL

TO THE HONORABLE JUDGE OF SAID COURT:

The United States of America, by and through the undersigned Assistant United States Attorneys for the Western District of Texas, respectfully requests that the Court seal the Complaint and its attached Affidavit, the Arrest Warrant, and the case in its entirety until further Order of this Court. The Defendant is at-large overseas.

The government understands that the court has a Standing Order regarding sealing Complaints and related documents, but is requesting an Order in this case that will maintain the sealing while at the same time allow the Complaint, Affidavit, and Arrest Warrant to be shared with other entities deemed appropriate by the government, including other U.S. Government entities, foreign law enforcement, foreign government entities, the defendant, or other entities with the ability to disrupt any ongoing offenses.

Therefore, we request that the case and all filed documents to date remain under seal, but that a file-stamped copy of the Complaint, Affidavit, and Arrest Warrant be provided to the government, and the government be allowed to share those documents with other entities as deemed appropriate by the government.

Respectfully submitted,

JAIME ESPARZA

United States Attorney

By: /s/ Michael Galdo

MICHAEL C. GALDO
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Assistant United States Attorneys